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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

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IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION.

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Case No. 4:22-MD-03047-YGR (PHK)

MDL No. 3047

**STIPULATION AND [PROPOSED]  
ORDER REGARDING MARKING  
DEPOSITION EXHIBITS**

1       **WHEREAS**, the parties have met and conferred regarding a protocol for marking  
 2 deposition exhibits as contemplated by the *Stipulation and Order Governing Protocol for Fact*  
 3 *Discovery and Rule 30(b)(6)/PMQ Depositions* (ECF 742) at paragraph II (N)(7).

4       **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between the parties hereto  
 5 through their respective attorney of record that for each Defendant Group (Meta,  
 6 TikTok/ByteDance, Snap and YouTube/Google) or Third-Party, documents will be marked  
 7 sequentially within each deposition starting with Exhibit 1, and because of the number of  
 8 depositions anticipated, the parties agree that there is no need to mark exhibits sequentially across  
 9 depositions. Exhibits shall be marked at depositions as follows:

- 10           • For depositions of Plaintiffs' fact witnesses and for case-specific third-party  
                  witnesses (e.g., treating physicians): "[Plaintiff Last Name / School District / State],  
                  Witness Name<sup>1</sup>, Exhibit Number". For example, "Doe-Jane Doe-1", 2, 3, etc. and  
                  "Doe-James Doe-1", 2, 3, etc.
- 11           • For depositions of Defendants' fact witnesses: "Defendant Group Name, Witness  
                  Last Name, Exhibit Number". For example, "Meta-Smith-1", 2, 3, 4, etc. and  
                  "TikTok-Smith-1", 2, 3 etc.

12       This Stipulation and Order Regarding Marking Deposition Exhibits ("Order") shall govern  
 13 the conduct of fact as well as Fed. R. Civ. P. 30(b)(6)/PMQ depositions for all cases currently in  
 14 MDL No. 3047 ("MDL") and hereafter added or transferred to MDL No. 3047, all cases currently  
 15 in California JCCP No. 5255 ("JCCP") and hereafter added or transferred to JCCP No. 5255, and  
 16 any deposition that is originally noticed in the MDL or JCCP and cross-noticed by parties in Related  
 17 Actions.<sup>2</sup>

18       [SIGNATURE BLOCKS ON THE NEXT PAGE]

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 26       <sup>1</sup> Where counsel is aware at the time of the deposition that there will be multiple deponents  
                  with the same last name in a specific case, counsel shall endeavor to mark exhibits with either  
                  each witness's full name or sufficient initials to distinguish the witnesses from one another.

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 28       <sup>2</sup> For purposes of this Order, "Related Actions" shall have the same meaning as in the *Stipulation and*  
                  *Order Governing Protocol for Fact Discovery and Rule 30(b)(6)/PMQ Depositions* (ECF 742).

1 Dated: July 8, 2024

2 Respectfully submitted,

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15 **IT IS SO ORDERED** that the foregoing Stipulation is approved.

16 DATED: July 8, 2024

17   
18 \_\_\_\_\_  
19 HONORABLE PETER H. KANG  
20 United States District Court Magistrate Judge

## **ATTESTATION**

I, Andrea R. Pierson, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: July 8, 2024

s/ Andrea R. Pierson  
Andrea R. Pierson